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May 20, 2022

VIA ECF

Honorable Vernon S. Broderick
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 518
New York, NY 10007

Re: *Sjunde AP-Fonden v. The Goldman Sachs Group, Inc., et al.*, No. 1:18-cv-12084

Dear Judge Broderick:

We represent Lead Plaintiff Sjunde AP-Fonden (“Lead Plaintiff”) in the above-referenced matter. We write regarding Lead Plaintiff’s Motion for Issuance of Hague Convention Letters of Request for International Judicial Assistance (the “Motion”), which seeks to obtain the testimony of three former employees of Defendant The Goldman Sachs Group, Inc. who are believed to be located in the United Kingdom. ECF Nos. 170-75. Lead Plaintiff filed its Motion on May 9, 2022.

The Parties have met and conferred regarding the Motion and the substance of the Letters of Request. Defendants represented that they would not oppose the Motion if Lead Plaintiff amended certain aspects of the Letters of Request. Lead Plaintiff has incorporated Defendants’ requested amendments in the Letters of Request, which were filed via ECF earlier today. ECF Nos. 181-82. Accordingly, the previously filed Motion (ECF No. 171) is mooted by the instant Unopposed Motion (ECF No. 178). Lead Plaintiff respectfully requests that the Court grant the Unopposed Motion and issue the accompanying Letters of Request so that the requested testimony may be taken prior to the December 30, 2022 deadline for fact discovery.

We thank Your Honor for the Court’s attention to this matter.

Respectfully submitted,

S/ Andrew L. Zivitz
Andrew L. Zivitz

cc: All Counsel of Record (via ECF)